

UNITED STATES DISTRICT COURT

FILED

January 31, 2025

for the

Southern District of Texas

Nathan Ochsner, Clerk of Court

United States of America

v.

JAVIER ENRIQUE SANCHEZ-MALDONADO

Case No.

4:25-mj-0044*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 24, 2024 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:*Code Section*

8 U.S.C. § 1326 (a) and (b)

Offense Description

a native and citizen of Honduras, and an alien who had been previously deported from the United States, subsequent to having been convicted of a crime defined as a felony, was found unlawfully in the United States at Houston, Texas, the said defendant having not obtained the consent before March 2003 from the Attorney General of the United States to reapply for admission into the United States; and without having obtained corresponding consent after February 2003 from the Secretary of Homeland Security pursuant to 6 U.S.C. §§ 202(3) and (4) and 6 U.S.C. § 557,

This criminal complaint is based on these facts:

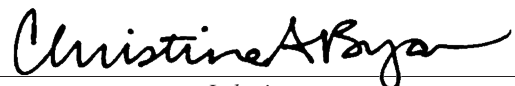
See Attached Affidavit in support of the Criminal Complaint

☐ Continued on the attached sheet.*Complainant's signature*

Justin Vedder, ICE Deportation Officer

Printed name and title

Sworn to me telephonically.

Date: 01/31/2025*Judge's signature*City and state: Houston, TX

Christina A. Bryan, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Justin Vedder, being duly sworn by telephone, hereby depose and say:

(1) I am a Deportation Officer with the United States Immigration and Customs Enforcement (“ICE”) and have served in that capacity since September 2016. Prior to this assignment, I have held the following positions: US Customs and Border Protection Officer and Immigration Enforcement Agent. My law enforcement career began on January 26, 2004, as a US Customs and Border Protection Officer. I have over 21 years of immigration law enforcement experience.

(2) On January 29, 2025 at approximately 2210 hours, Javier Enrique Sanchez Maldonado was arrested by ICE. The Defendant also goes by the alias(s) of Javier Sanchez-Maldonado, Javier Enrique Maldonado, Javier Sanchez Maldonado, Javier Enrique Sanchez, Javier E Sanchez-Maldonado and Javier Enriq Sanchez Maldonado.

(3) The Defendant’s fingerprints have been taken and electronically submitted to various law enforcement databases. According to the Integrated Automated Fingerprint Identification System (IAFIS), the Defendant is the same individual as the person referred to in this Affidavit as having been previously convicted and deported.

(4) Based upon the information from ICE’s records as described below, and my training and experience, I submit that there is probable cause to believe that the Defendant is in violation of 8 U.S.C. § 1326(a) and (b).

(5) Element One: The Defendant is a citizen and national of Honduras and not a native, citizen or national of the United States.

(6) Element Two: The Defendant has previously been deported or removed from the United States on the following occasion(s):

- a. February 26, 2020
- b. July 15, 2019

(7) Element Three: After deportation, the Defendant was subsequently found in the United States on July 24, 2024 in Houston, Harris County, Texas, which is within the Houston Division of the Southern District of Texas. Additionally, I consulted with ICE’s Law Enforcement Support Center (“LESC”) to determine whether, in the past five years and after the Defendant’s last deportation, the Defendant had been encountered by law enforcement prior to the date

specified earlier in this paragraph. On January 30, 2025, the LESC advised me that it had no record of such an encounter.

(8) Element Four: The Defendant did not have permission to re-enter the United States. On January 30, 2025, I reviewed the contents of the Alien File associated with this Defendant and/or available database information. I found no indication that the Defendant has ever received permission from the Attorney General of the United States, or the Secretary of the Department of Homeland Security, to apply for admission to the United States following deportation from the United States. I have requested certification of this fact from the Records Branch of the Immigration Service.

(9) Prior Criminal History / Gang Affiliation. The Defendant has the following prior criminal history and/or gang affiliation:

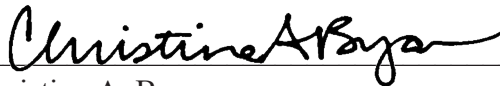
- a. On July 23, 2024, the Defendant, using the name Javier Enriquez Maldonado Sanchez, was convicted in the 263rd District Court of Harris County, TX, for ASSAULT- FAMILY MEMBER under case 187791601010. For this offense, the Defendant was sentenced to 1 year confinement.
- b. On December 23, 2019, the Defendant, using the name Javier Enrique Sanchez-Maldonado, was convicted in the United States District Court for the District of Arizona, for violation of 8 USC 1326(a), under case CR-19-03271-001-TUC-RCC (JR). For this offense, the Defendant was sentenced to Time Served (81 days).
- c. On July 1, 2019, the Defendant, using the name Javier Enrique Sanchez Maldonado, was convicted in the County Criminal Court at Law No. 16 in Harris County, TX, for DWI 1st OFFENDER BAC \geq 0.15, under case 225781101010. For this offense, the Defendant was sentenced to 30 days confinement.

On January 31, 2025, I contacted the U.S. Attorney's Office, Southern District of Texas, Houston Division, concerning this criminal complaint. On or about that day, Assistant U.S. Attorney Charmaine Holder (713-819-6407) accepted this case for prosecution for a violation of 8 U.S.C. § 1326(a) and (b).



Justin Vedder, Deportation Officer
United States Department of Homeland Security
U.S. Immigration & Customs Enforcement

Signed and sworn telephonically before me this 31st day of January, 2025, and I find probable cause.



Christina A. Bryan
United States Magistrate Judge
Southern District of Texas